



600 SOUTH AVENUE WEST • WESTFIELD, NEW JERSEY 07090
908.654.5000 • FAX 908.654.7866 • WWW.LDLKM.COM

PATENTS, TRADEMARKS, COPYRIGHTS & UNFAIR COMPETITION

Paul H. Kochanski
908.518.6314
pkochanski@ldlkm.com

April 30, 2012

VIA FACSIMILE (212.805.7920)

Honorable Shira A. Scheindlin, U.S.D.J.
United States District Court for the
Southern District of New York
500 Pearl Street, R.M. 1620
New York, NY 10007

Re: IPVENT 6.1-001
IP Venture, Inc. v. IBM Corporation
Civil Action No.: 12-CV-0418 (SAS)

Dear Judge Scheindlin:

With the Court's indulgences, accompanying this letter, please find a Third Stipulation to Extend Time for Defendant's Response to Plaintiff's Amended Complaint. As counsel for plaintiff, we are again submitting this on behalf of the defendant IBM Corporation since counsel has not yet appeared for the defendant IBM in this action. On April 13, 2012, this Court granted defendant IBM Corporation's second request for extension of time extending the time to respond to the Complaint from April 16, 2012 to April 30, 2012, so that the parties could participate in settlement discussions. At this time, the parties respectfully request to the Court to further extend the time for defendant IBM to respond to the Amended Complaint from April 30, 2012 until June 4, 2012.

This request is made with the consent of the plaintiff. The parties had previously requested a second extension of time to participate in a meeting between the parties on April 18, 2012 to discuss possible resolution of the action. That meeting did in fact take place on April 18, 2012. As a result of that meeting, the parties have decided that further discussions would be very helpful in attempting to resolve the present matter. Accordingly, the next meeting is now scheduled between the parties and principals for May 30, 2012. The parties have attempted to schedule this meeting early in the month of May but have been unable to coordinate the attorneys' and principals' schedule for such earlier date.

Request denied. Two extensions
all more than enough. Defendant's
response is due on or before May 11, 2012.
No further extension will be granted
for any reason. So Ordered.
JMS/LLC USDC 4/30/12

